

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
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)
)

Regulation of Prepaid Calling Card Services;)
Arizona Dialtone Inc. Petition for)
Reconsideration)
_____)

WC Docket No. 05-68

**COMMENTS OF NATIONAL BRANDS, INC. d/b/a SHARENET COMMUNICATIONS
IN SUPPORT OF ARIZONA DIALTONE INC. PETITION FOR
RECONSIDERATION**

National Brands, Inc. d/b/a Sharenet Communications ("Sharenet") hereby files these brief comments in support of the Petition for Reconsideration filed by Arizona Dialtone Inc. in the above-captioned proceeding.¹ Sharenet is a small CLEC operating in Arizona.

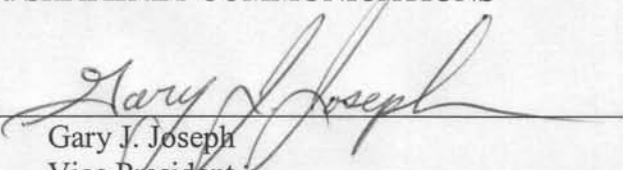
Arizona Dialtone is exactly correct in its characterization of the problem: many prepaid calling card service providers utilize local telephone number routing for their long-distance prepaid calling services. As a result, these providers totally escape originating access charges, because an originating LEC cannot identify these calls as long-distance access calls rather than ordinary local calls. The FCC's recent Order declaring that prepaid card providers are IXCs subject to access charges will be meaningless unless the FCC grants Arizona Dialtone's petition.

¹ See *Public Notice*, DA 06-1948, rel. Sept. 28, 2006.

Respectfully submitted

NATIONAL BRANDS, INC.
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